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*Attorneys for Plaintiffs-Relators ERIN HAYES  
and RICHARD PONDER*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA and the  
STATE OF CALIFORNIA ex rel. ERIN  
HAYES and RICHARD PONDER,

Plaintiffs,

v.

COVIDIEN, INC., a corporation,

Defendant.

CASE NO. C 14-1511 EDL

**JOINT STIPULATION FOR  
VOLUNTARY DISMISSAL**

**Fed. R. Civ. Prod. 41(a)(1)(A)**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A), Plaintiffs-Relators Erin Hayes and Richard Ponder (together, "Plaintiffs") and Defendant Covidien LP<sup>1</sup> ("Covidien") hereby stipulate and agree that Plaintiffs' claims alleged and asserted pursuant to 31 U.S.C. § 3730(h) in the above-captioned action (Case No. C 14-1511 EDL), as set forth and alleged in the Third and Fourth Counts, respectively, of the operative complaint therein, shall be dismissed with prejudice, as a result of settlements reached between Plaintiffs and Covidien. The Government is informed of and does not object to the filing of this stipulated dismissal. Each party will bear its own costs and fees as set forth in the agreements.

**SO STIPULATED AND AGREED TO BY:**

Dated: May 3, 2019

OLIVIER SCHREIBER & CHAO LLP

BROWN | POORE LLP

By: /s/ Christian Schreiber  
Christian Schreiber

Attorneys for Plaintiffs-Relators,  
ERIN HAYES AND RICHARD PONDER

Dated: May 3, 2019

ROPES & GRAY LLP

By: /s/ Anne Johnson Palmer  
Anne Johnson Palmer

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<sup>1</sup> Covidien LP was erroneously named as Covidien, Inc. in the complaint.